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August 6, 2001

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-355 and Riser Cable and Terminating Wire as Ordered in TRA Docket No. 98-00123*
Docket No. 00-00544

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's response to the Staff's Data Request of July 26, 2001 in this matter. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

Request: Has BellSouth fully implemented the Telcordia solution for:

- a. Line Sharing/Splitting
- b. Loop Make-up

If yes, is the Telcordia solution commercially available? How many orders or preorders have been processed through this electronic makeup since?

Response: a. No. BellSouth did not implement the Telcordia solution for electronic ordering. For Line Sharing, BellSouth uses the Encore solution. For Line Splitting, BellSouth is in the process of deploying mechanization using the Encore solution.

The cost study for line sharing filed in Tennessee includes the Telcordia Solution expense. However, in a region-wide settlement with the Data Coalition, which was the subject of the Authority's March 7, 2001, Notice of Filing Comments, BellSouth has agreed to charge \$0.61 for line sharing. That rate does not include the Telcordia Solution expense.

b. Yes, BellSouth has implemented the Telcordia solution for Loop Make-up and it is commercially available. Approximately 18,500 requests have been processed between Jan-May, 2001, inclusive.

Request: What provisioning time intervals does BellSouth offer to its ADSL unit?

Response: BellSouth does not have an ADSL unit. BellSouth Telecommunications, Inc. (BST) offers a wholesale ADSL telecommunications service to ISPs/NSPs. BST also offers its BellSouth® FastAccess® Internet Service, as a retail non-regulated Internet access service. In this capacity, BST purchases from the wholesale ADSL tariff, just as other ISPs/NSPs do. In responding to this question, we are referring to the intervals that are associated with the wholesale ADSL telecommunications service.

The intervals within which BellSouth provisions its wholesale ADSL products to ISPs/NSPs (including BST's non-regulated FastAccess DSL offering) are set forth in the chart below. The stated intervals do not include whatever additional time it may take the ISP/NSP (including BST's non-regulated FastAccess DSL offering) to provide retail ADSL service to an end user and do not include the provisioning of the exchange service, since existing service is required before ADSL can be offered.

For purposes of clarification, it must be noted that the intervals set forth below are not the intervals within which BellSouth provisions xDSL-compatible loops to CLECs. The intervals for provisioning xDSL-compatible loops were not the subject of this request, although BellSouth will provide such information if requested.

New Installations		
If Data Rate is:	And:	Provisioning Due Date Interval is:
1.5 Mbps x 256 Kbps	1-5 POTS Lines (w/o NID or SYNC-at-NID)	3 Business Days (Monday – Friday)
	1-5 POTS Lines (with NID or SYNC-at-NID)	4 Business Days (Monday – Saturday)
	6-14 POTS Lines (w/o NID or SYNC-at-NID)	5 Business Days (Monday – Friday)
	6-14 POTS Lines (with NID or SYNC-at-NID)	5 Business Days (Monday – Saturday)
	Centrex Lines (w/o NID or SYNC-at-NID)	5 Business Days (Monday – Friday)
	Centrex Lines (with NID or SYNC-at-NID)	5 Business Days (Monday – Saturday)
	>14 Lines	Project Guidelines
768 Kbps x 512 Kbps		Minimum 5 Business Days (Service Inquiry Process Required) (If w/NID or SYNC-at-NID requested, Monday – Saturday apply) (If w/o NID or SYNC-at-NID, Monday – Friday apply)
192 Kbps x 192 Kbps		
384 Kbps x 384 Kbps		
1.5 Mbps x 512 Kbps		
2.0 Mbps x 640 Kbps		
4.0 Mbps x 640 Kbps		
Demo Line	Removing ADSL	Add ADSL Order Due Date + 6 Calendar Days

Request: What time intervals does BellSouth provide to its ADSL retail offerings for access to loop qualification?

Response: BellSouth's Loop Qualification System (LQS) is available and accessible to all ISP/NSP customers 7 days a week, 24 hours per day except during planned maintenance and upgrades.

Request: Did BellSouth modify its OSS for the purpose of its ADSL retail offerings? If yes, what was the total amount assigned to OSS modifications?

Response: Yes.

No costs associated with the modifications to the OSS for the ADSL retail offering were included in the UNE Cost Studies filed in this docket.

Request: What is the actual percentage of loops requiring loop conditioning as of December 2000?

Response: BellSouth assumes the TRA is referring to UNE loops.

The percent of UNE loop modifications made as of December 2000 in TN was zero.

Request: As of June 30, 2001, what is the percentage of loops served by NGDLC in Tennessee?

Response: As of June 30, 2001, 6.4% of loops in Tennessee were being served by NGDLC.

Request: Has BellSouth received orders from any CLEC to expand the CLEC's existing collocation arrangement? If so, how many orders has BellSouth received? How many days on average did it BellSouth to complete the expansion?

Response: Yes. From December 1999, to the present (July 31, 2001) BellSouth has completed a total of 43 orders from CLECs for additional space to their existing collocation arrangements in the State of Tennessee.

BellSouth completed its work to provide this additional space in an average time interval of 58 calendar days.

Request: Please provide a summary table comparing the number and growth of your switched and special access analog and digital lines from 1997 to 2000. Please show also the number of switched access lines sold to CLECs and the number of switched access lines used by BellSouth's xDSL offerings.

Response: BellSouth is continuing to compile this response and provides this partial response. BellSouth expects to supplement this response by Friday, August 10, 2001.

BellSouth has sold the following number of lines to CLECs as of each show year end.

	<u>1998</u>	<u>1999</u>	<u>2000</u>
Resale	23,556	28,814	35,894
UNE	74,317	191,281	280,637

Request: How much does BellSouth charge its ADSL unit for manual and electronic access to loop makeup information? How long has BellSouth been charging its ADSL unit for loop makeup information?

Response: BellSouth does not have an ADSL unit. BellSouth Telecommunications, Inc. is the provider of BellSouth® FastAccess® DSL -- a non-regulated high speed Internet access offering. Please see BellSouth's response to Item 2 for a complete description.

BellSouth's retail units obtain information regarding the qualifying characteristics of a loop through LQS.

BellSouth does not impute any cost to itself for access to LQS, nor does it charge any ISP or CLEC for access to LQS.

In determining whether a customer is eligible for BellSouth FastAccess DSL service, BellSouth's retail units do not obtain characteristics of the loop through any method other than LQS.

Request: In your cost study, the time input for LMU with facility reservation number exceeds the time input for the same element without facility reservation. The Staff believes that it should be the opposite. Would you explain?

Response: The activity of reserving a facility is conducted by the engineering staff (JFC 4FXX) and then only if requested by the CLEC. This activity is an additional step in the loop make-up process and takes an additional 5 minutes. Therefore, the total minutes for the engineering staff (JFC4FXX) for a loop make-up without facility reservation is 15 minutes versus 20 minutes for a loop make-up with facility reservation.

Request: BellSouth's "TN-xdsl.xls, INPUTS CONNECT &TEST" (P.000162, Study Date) shows on lines 19, 20 and 21 the same description of work activity (i.e., Performs frame continuity and due date coordination and testing). Could you explain?

Response: The descriptions found on Lines 19, 20, and 21 represent the same work activity for the UNEC staff for performing frame continuity and due date coordination. However, each line is used for a different UNE within the file. For example, Line 19 with 53.6 minutes applies only to UCL, Line 20 with 54 minutes only applies to ADSL, and Line 21 with 84 minutes only applies to HDSL. The work times differ based on the coordination or continuity testing for the service being provisioned.

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

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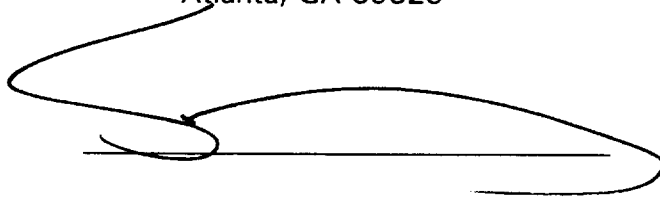
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A handwritten signature in black ink, appearing to read "Catherine F. Boone", is written over a horizontal line. The signature is stylized with a large loop at the end.